



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Facility: Rock Creek Park, National Park Service Facility
Facility Address: Maintenance Yard, 5000 Glover Road, NW, Washington, DC 20010
Mailing Address: 3545 Williamsburg Lane, NW Washington, DC 20008

Report Prepared on: May 6, 2013 By: [Signature], ERG
Date Signature

Report Final as of: September 17, 2013 By: [Signature], EPA
Date Signature

General Information

Type of Facility: Industrial **Primary Activity Code:** AD
Activity/Product: Non-Classified Facilities
Owner: U.S. National Park Service
Operator: Rock Creek Park, National Park Service
Permittee: Rock Creek Park, National Park Service
Permit Application Date: October 15, 2010
Permit Tracking Number: DCR05A875
Permit Effective Date: December 14, 2010
Permit Expiration Date: December 14, 2015
SWPPP Development Date: Not applicable – No SWPPP was provided
SWPPP Developed By: Not applicable – No SWPPP was provided
Site Area: 3 acres
Receiving Water and/or MS4: Rock Creek

On-Site Inspection Overview

Inspection Date: February 21, 2013 **Entry Time:** 8:18 am EST **Exit Time:** 11:08 am EST

Name	Title/Affiliation	Telephone
Inspectors:		
Allison Graham	Inspector – USEPA Region 3	(215) 814-2373
Seth Heminway	Inspector – USEPA	(202) 564-7017
Mark Briggs	Inspector – ERG	(989) 345-7595
Eleanor Coddling	Inspector – ERG	(703) 633-1673
Kathleen Wu	Inspector – ERG	(703) 633-1625

Rock Creek Park National Park Service
Industrial Stormwater Inspection Report

Name	Title/Affiliation	Telephone
Site Representatives:		
Nick Bartolomew	Chief of Resources Management, Rock Creek Park National Park Service	(202) 895-6010
Joe Kish	Rock Creek Park National Park Service	(202) 895-6004
Dawna St. Louis	Maintenance Supervisor, Rock Creek Park National Park Service	(202) 895-6065
Bill Yeoman	Resource Management Specialist, Rock Creek Park National Park Service	(202) 895-6074
Other Participants:		
Adion Chinkuyu	Inspector – District Department of the Environment (DDOE)	(202) 535-2193
David Pilat	Inspector – District Department of the Environment (DDOE)	(202) 281-3963

A copy of the Rock Creek Maintenance Yard (the “Facility”) Notice of Intent (NOI) and the associated Acknowledgement Letter from EPA’s Stormwater NOI Search Page¹ are contained in Appendix A. A facility layout map and site location map for the Rock Creek Park Maintenance Yard are provided in Appendix B. Appendix B also includes a facility map showing drainage area improvements. A sign in sheet from the inspection is provided in Appendix C.

Credential Presentation:

Ms. Allison Graham with USEPA Region 3 presented credentials to Mr. Kish, Mr. Bartolomew, Ms. St. Louis, and Mr. Yeoman and explained that the purpose of the inspection was to evaluate compliance with the 2008 USEPA Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). The EPA inspection team was comprised of Ms. Graham, Mr. Heminway, Mr. Briggs, Ms. Wu and Ms. Codding.

Weather and Precipitation:

Clear, cold weather conditions with temperatures in the 40°F range were experienced during the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service rainfall data prior to the inspection are provided in the table below.

Rainfall Data Prior to Inspection of Rock Creek Park Maintenance Yard

Date	Rainfall Amount (inches) ^a
February 14, 2013	0.00
February 15, 2013	0.10
February 16, 2013	0.02
February 17, 2013	0.00
February 18, 2013	0.00
February 19, 2013	0.07
February 20, 2013	0.00

a. Recorded at Washington Reagan National Airport.

¹EPA’s Stormwater NOI Search database, commonly referred to as the eNOI database, includes NOIs submitted under EPA’s 2008 Construction General Permit and is available at the following address:
<http://cfpub1.epa.gov/npdes/stormwater/noi/noisearch.cfm>.

Documentation:

Documents requested by the EPA inspection team during the inspection and provided by Rock Creek Park Maintenance Yard on March 13, 2013 are listed in the document log included in Appendix D. EPA obtained a copy of the NOI and EPA Region 3 acknowledgement letter from EPA's Stormwater NOI Search Page², both contained in Appendix A. The Facility did not provide the Stormwater Pollution Prevention Plan (SWPPP), site self inspection reports, or Aqua-SwirlTM and FilterraTM maintenance logs requested by the EPA inspection team at the close of the inspection. The Facility provided a facility layout map and a map showing where drainage area improvements were made, both included as part of Appendix B. The Facility also provided a diagram of its stormwater piping and outfall improvements and literature on the operation of their FilterraTM filter and Aqua-SwirlTM oil/water separation system, listed in Appendix D. Each of these documents is provided in its entirety on the compact disk (CD) accompanying this report. Photographs were taken by Ms. Allison Graham, EPA, during the inspection and are provided in Appendix E. Appendix F contains a 2011 Facility inspection report performed by the District of Columbia Department of the Environment (DDOE).

Description of Industrial Operations

Rock Creek Park Maintenance Yard is a federal facility located in Northeast Washington DC (see Appendix B). Mr. Kish stated that the Facility maintains Rock Creek Park and stores the required equipment and machinery on site. Maintenance performed includes repair of trails, salting and sanding of access roads, fueling vehicles, maintaining vehicles, and vegetation maintenance, including mowing, pruning, and tree cutting/removal. Approximately 25 to 30 people work at the Facility.

The Facility includes the following buildings, as marked on the Site Layout Map in Appendix B: offices, salt storage barn, car maintenance, equipment storage, ground storage, stone cutting shed, pole barn, tree crew storage, salt spreaders, storage area for stones from the capitol, equipment bays, and chemical storage. It operates a fueling station with underground storage tanks containing unleaded gasoline and diesel.

Mr. Kish stated that the Chemical Storage shed holds chemicals such as solvents, herbicides (RoundupTM), pesticides, and paint. Ms. St. Louis stated that salt and sand are stored on site. The Facility also uses beet juice mixed with salt for deicing pavement, but they fill up off site and do not store beet juice on site.

Mr. Kish stated that no vehicle washing is performed on site. The vehicle maintenance performed includes minor work such as oil changes.

NOI/Permit Requirements and Observations

The following observations were made relative to the requirements of the NOI for Storm Water Discharges Associated with Industrial Activity under the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit and the MSGP. During the inspection, the EPA

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inspection team walked the entrance, exit, outdoor storage areas, and equipment maintenance areas of the Facility.

MSGP Section 1.3.1 (Deadlines for Submitting Your NOI and Your Official Date of Permit Coverage) – The MSGP, which became effective on September 29, 2008 and regulates stormwater discharges from industrial facilities in 29 different industrial sectors, requires industrial facilities to implement and maintain site-specific stormwater control measures and to develop SWPPPs. New industrial facilities which began operating after January 5, 2009 must submit an NOI a minimum of 60 days prior to commencing discharge, or a minimum of 30 days if the SWPPP is posted on the Internet during this period and the Internet address (i.e., URL) to the SWPPP is provided on the NOI form.

Observation 1: Rock Creek Park Maintenance Yard is classified as an industrial facility categorized under Sector AD, Subsector AB1: Non-Classified Facilities according to Appendix D of the MSGP. According to the Acknowledgment Letter in Appendix A, Rock Creek Park Maintenance Yard applied for coverage under the MSGP on October 15, 2010; approximately 2 years after the MSGP was issued. Mr. Kish stated that the prior environmental services manager had completed the NOI when their prior permit had expired. The Facility contacts were unsure if the NOI had been submitted. After the inspection, the EPA inspection team obtained a copy of the Rock Creek Maintenance Yard NOI and the associated Acknowledgement Letter from EPA's Stormwater NOI Search Page³, both contained in Appendix A.

MSGP Section 2.1.2.1 (Minimize Exposure) – Section 2.1.2.1 of the MSGP requires a facility to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface area is not recommended). At a minimum, the MSGP requires:

- Grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;
- Locating materials, equipment, and activities so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas);
- Cleaning of spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- Using drip pans and absorbents under or around leaky vehicles and equipment or storing materials indoors where feasible;
- Draining fluids from equipment and vehicles prior to on-site storage or disposal.

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<http://cfpub1.epa.gov/npdes/stormwater/noi/noisearch.cfm>.

Observation 2: The EPA inspection team made the following observations regarding exposure minimization:

- A stormwater gutter was located adjacent to the salt storage area (see Photograph 20 in Appendix E).
- Fluid staining was observed in parking lot locations throughout the Facility (see Photographs 26, 30, 35, 48, 49, 51, 52 and 60 in Appendix E). Photograph 51 in Appendix E shows fluid staining under a truck that had been damaged in an electrical fire and was waiting for maintenance, according to Mr. Kish. Photograph 52 in Appendix E shows staining in a small gully that directs stormwater below a fence from the maintenance yard.

MSGP Section 2.1.2.2 (Good Housekeeping) – Section 2.1.2.2 of the MSGP requires a facility to keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.

Observation 3: The EPA inspection team made the following observations regarding housekeeping:

- Salt was present on the parking lot outside of the salt barn (see Photograph 22 in Appendix E).
- A pile of what appeared to be a salt and sand mixture was located along the fence perimeter (see Photographs 27 and 28 in Appendix E) and what appeared to be spill clean-up material was discovered in the parking lot near a trench drain (see Photographs 69 and 70 in Appendix E).
- Several dumpsters, road block materials, a battery and electronic trash were not covered and not located in covered areas (see Photographs 44, 45, 46, 47, and 50 in Appendix E).

MSGP Section 2.1.2.3 (Maintenance) and Section 2.1.2.4 (Spill Prevention and Response Procedures) – Section 2.1.2.3 and 2.1.2.4 of the MSGP require a facility to regularly inspect, test, maintain, and repair all industrial equipment and systems to avoid situations that may result in leaks, spills, and other releases of pollutants in stormwater discharged to receiving waters. The permit requires that the facility, at a minimum, develop plans for effective response to such spills if or when they occur, including:

- Procedures for plainly labeling containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides,” etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur; and
- Procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. Employees who may cause, detect, or respond to a spill or leak must be trained in these procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of the facility stormwater pollution prevention team (see Part 5.1.1).

Observation 4: The EPA inspection team observed the storage of liquid materials outdoors without cover and not stored in secondary containment. Photograph 13 in Appendix E shows the outdoor storage of two drums with open bungholes. The

EPA inspection team observed liquid inside one drum and that the label indicated the material in the drum was "corrosive" (see Photograph 14 in Appendix E). The EPA inspection team observed a gasoline can being stored outside in an uncovered area (see Photograph 39 in Appendix E) and an uncovered yellow trash can containing liquid stored outdoors (see Photographs 18 and 19 in Appendix E).

MSGP Section 2.1.2.9 (Employee Training) – Section 2.1.2.9 of the MSGP states the permittee must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training must cover both the specific control measures used to achieve the effluent limits, and monitoring, inspection, planning, reporting, and documentation requirements in other parts of this permit. EPA recommends training be conducted at least annually (or more often if employee turnover is high).

Observation 5: Stormwater training has not been provided to employees that work in areas where industrial materials are exposed to stormwater. According to Mr. Kish, training is provided for spill prevention and response and handling of hazardous materials but not training specific to the SWPPP.

MSGP Section 4.1 (Routine Facility Inspections) – Section 4.1 of the MSGP requires that the facility conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the permit. Routine facility inspections must be conducted at least quarterly. Section 4.1.2 of the MSGP states the permittee must document the findings of each routine facility inspection performed and maintain this documentation on-site with the SWPPP.

Observation 6: According to Mr. Kish, Ms. St. Louis inspects the Rock Creek Park Maintenance Yard at least quarterly to look for maintenance needs, erosion or other problems, but that no one specifically performed quarterly or annual stormwater inspections. The SWPPP was not available to the inspection team during the site inspection.

MSGP Sections 4.2.1 (Quarterly Visual Assessment Procedures) and 4.3.1 (Comprehensive Site Inspection Procedures) – Section 4.2.1 of the MSGP requires quarterly visual testing of stormwater. Section 4.3.1 of the MSGP requires annual comprehensive site inspections.

Observation 7: See Observation 6.

MSGP Section 5.1 (Stormwater Pollution Prevention Plan) – The permittee must prepare a SWPPP for the industrial facility before submitting its Notice of Intent (NOI) for permit coverage. If a SWPPP was prepared for coverage under a previous NPDES permit, the permittee must review and update the SWPPP to implement all provisions of this permit prior to submitting your NOI. Section 5.1 of the MSGP requires the SWPPP to contain many elements, including a description of control measures and schedules and procedures to maintain those elements.

Observation 8: During the inspection, Mr. Bartolomew stated that he believed an electronic version of the SWPPP was available. Although EPA had requested that a copy of the SWPPP be provided to ERG no later than March 7, 2013 (see Photograph 80

in Appendix E), the Rock Creek Park Maintenance Yard had not provided a copy of a SWPPP at the time of the preparation of this report.

MSGP Section 7.2 (Annual Report) – Section 7.2 of the MSGP requires facilities to submit annual reports documenting comprehensive site inspections and any corrective action documentation.

Observation 9: The Rock Creek Park Maintenance Yard did not submit an annual report to either DDOE or EPA.

